

ORIGINAL
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Mailing Online Service, 1998)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: PAUL G. SECKAR
(OCA/USPS-T2-17-18)
(November 16, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

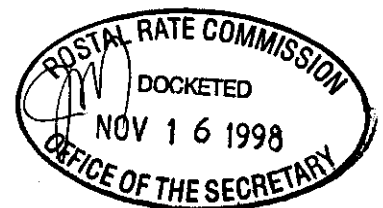
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

Shelley S. Dreifuss
Attorney



OCA/USPS-T2-17. Please refer to your response to OCA/USPS-T4-39(d), (f), and (h), and USPS-T-2, Exhibit A, Table 4.

- a. In Table 4, please confirm that the sum of pieces with 1-2 pages, 3-4 pages, 5-6 pages, 7-10 pages, 11-15 pages, and pieces with greater than 15 pages is 295,635,459 total pieces. If you do not confirm, please explain.
- b. Using the number of total pieces from part a. of this interrogatory, please confirm that the percentage of pieces with 1-2 pages and "More than 15 pages" is 67.81678168 ($200,490,454 / 295,635,459$) and 7.05070507 ($20,844,384 / 295,635,459$), respectively. If you do not confirm, please explain.
- c. Please confirm that your response to parts (d), (f), and (h), of OCA/USPS-T4-39 did not correct for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6. If you do not confirm, please explain.
- d. For "Next-Day Delivery," please confirm that the correct volume for 1-2 page Simplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 29,895,946 ($44,083,404 * 67.81678168$). If you do not confirm, please explain.
- e. For "Next-Day Delivery," please confirm that the correct volume for "More than 15 pages," Simplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 3,108,191 ($44,083,404 * 7.05070507$). If you do not confirm, please explain.
- f. For "Next-Day Delivery," please confirm that the correct volume for "More than 15 pages," Duplex pieces, correcting for the discrepancy identified in the

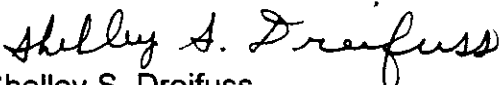
response of witness Rothschild to POIR No. 2, question 6, is 3,360,469 (47,661,453 * 7.05070507). If you do not confirm, please explain.

OCA/USPS-T2-18. Please refer to your response to OCA/USPS-T4-40(d) and (f), and USPS-T-2, Exhibit A, Table 4.

- a. In Table 4, please confirm that the sum of pieces with 1-2 pages, 3-4 pages, 5-6 pages, 7-10 pages, 11-15 pages, and pieces with greater than 15 pages is 295,635,459 total pieces. If you do not confirm, please explain.
- b. Using the number of total pieces from part a. of this interrogatory, please confirm that the percentage of pieces with "More than 15 pages" is 7.05070507 (20,844,384 / 295,635,459). If you do not confirm, please explain.
- c. Please confirm that your response to part (d) and (f) of OCA/USPS-T4-40 did not correct for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6. If you do not confirm, please explain.
- d. For "Standard (Two-To-five Day) Delivery," please confirm that the correct volume for "More than 15 pages," Simplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 6,908,538 (97,983,641 * 7.05070507). If you do not confirm, please explain.
- e. For "Standard (Two-To-Five Day) Delivery," please confirm that the correct volume for "More than 15 pages," Duplex pieces, correcting for the discrepancy identified in the response of witness Rothschild to POIR No. 2, question 6, is 7,469,272 (105,936,527 * 7.05070507). If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
November 16, 1998